



# Developing Common Due diligence tools Working Group

The Food Network for Ethical Trade – 24th October – 10.00 -16.00 hrs



# House Keeping

Samworth Brothers

QUALITY FOODS

## CRAFT & INNOVATION CENTRE

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### No Smoking or Vaping

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### Toilets

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### Lift

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### Fire Assembly Point

In the event of a fire, please leave your belongings and make your way to the assembly point located in the car park.

# Competition Law Statement

*“Today we are meeting to discuss the Food Network for Ethical Trade agenda of Enhanced and Cost Effective Due Diligence*

*We take competition compliance seriously. Whilst discussions can cover matters of interest to our industry, we cannot discuss or exchange sensitive commercial information.*

*If at any time during this meeting, you think our discussions may be in breach of competition rules, please inform the Chair. The Chair may close the meeting at any time if she believes that discussions are in breach of competition law”*



# Agenda

Estimated time	Item
10.00 – 10.20	<ol style="list-style-type: none"> <li>1. Welcome and introduction</li> <li>2. Setting the scene</li> <li>3. What do you understand by enhanced due diligence and what is an example of EDD</li> <li>4. What do we mean by Enhanced Due Diligence Systems?</li> </ol>
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# Cost Effective & Enhanced Due Diligence

In the context of **ethical due diligence**, **enhanced due diligence (EDD)** refers to a more comprehensive and rigorous process of evaluating a company, individual, or transaction with a focus on ethical compliance. This involves going beyond standard checks to ensure that ethical risks, such as human rights violations, environmental harm, corruption, or unfair labour practices, are thoroughly assessed and where possible, mitigated.

The goal of enhanced due diligence in the ethical context is to ensure that business practices align with ethical principles and to prevent harm to people, communities, and the environment. It helps companies and investors make informed decisions that reflect their values and commitments to corporate social responsibility (CSR), sustainability, and ethical governance.

Key Aspects of Enhanced Ethical Due Diligence:

## **In-Depth Assessment of Ethical Risks:**

- Investigating potential issues such as labour conditions, environmental impact, community relations, and adherence to human rights standards.
  - Evaluating the ethical practices of suppliers, partners, and subsidiaries, especially in high-risk regions or industries.

## **Stakeholder Engagement:**

- Engaging with stakeholders, including local communities, employees, and advocacy groups, to understand their perspectives and concerns regarding the entity or project under review.
  - Incorporating input from non-governmental organizations (NGOs) and other external experts who specialize in ethical issues.

## **Verification of Ethical Standards:**

- Verifying claims made by the company or individual regarding their ethical practices, such as sustainability initiatives, fair trade commitments, or labour policies.
  - Reviewing third-party audits, certifications, and compliance reports related to ethical standards.

## **Ongoing Monitoring and Reporting:**

- Continuously monitoring the entity's activities to ensure ongoing adherence to ethical commitments and to identify any emerging risks.
  - Regularly reporting on ethical performance to stakeholders, including investors, customers, and regulators.

## **Mitigation Strategies:**

- Developing and implementing strategies to address and mitigate any identified ethical risks, such as revising supply chains, improving labour conditions, or enhancing environmental protections.

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**Raising ethical standards  
within labour supply chains**

# McDonald's and supermarkets failed to spot slavery



- X Low barrier of entry to work
- X Limited vetting
- X Siloed & retrospective compliance data
- X Tools to support modern slavery training

**The Guardian**

Recruiters urged to clamp down on exploitation via 'umbrella companies'

## 14 RECRUITMENT COMPANIES MAKE HMRC SHAME LIST

DEEDEE DOKE | 21 February 2024



 **GOV.UK**

More than 200 companies named for not paying staff minimum wage



# Agency Audit Platform

A cloud based, supplier audit and analytics platform elevating transparency within the temporary labour market

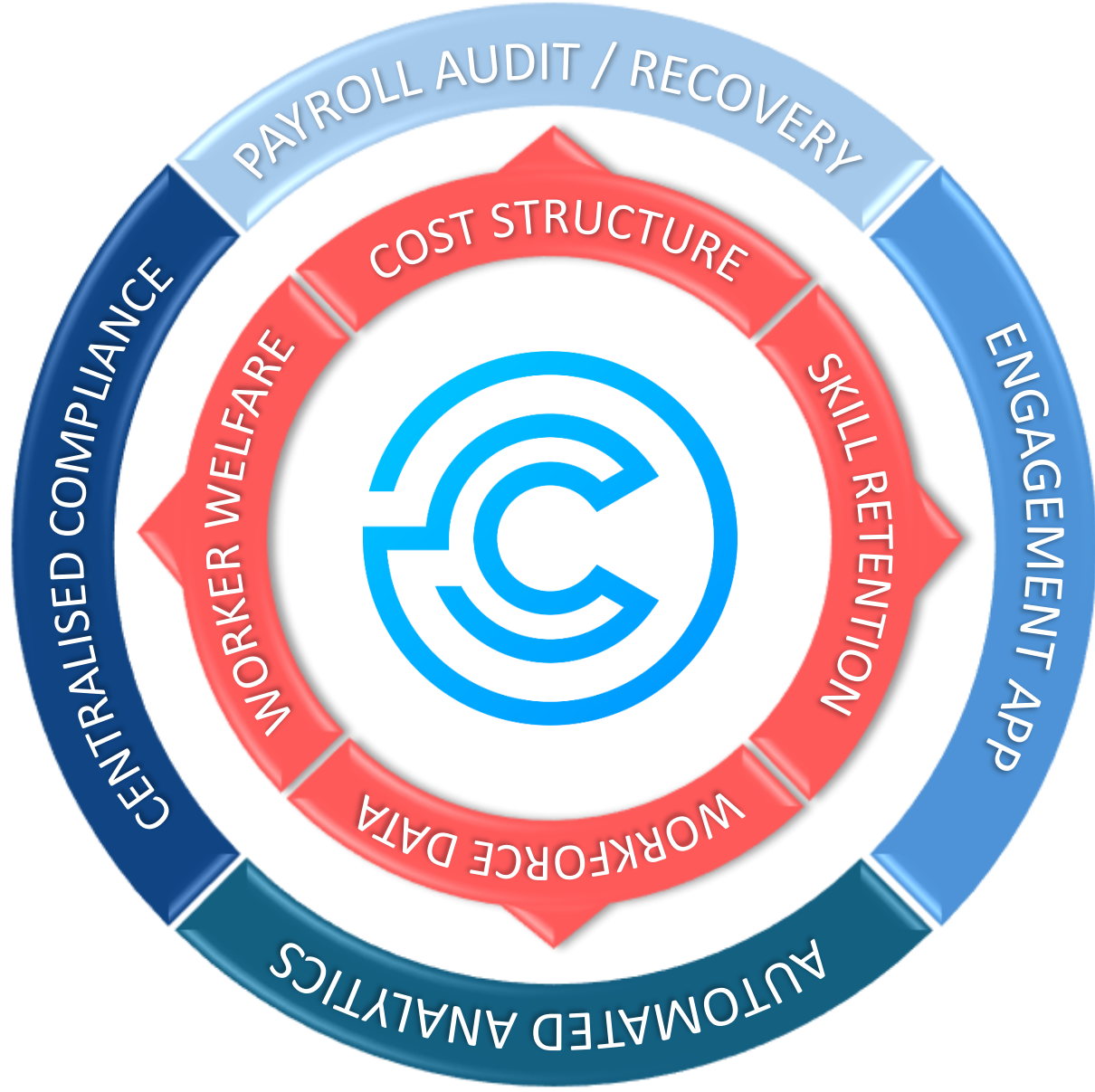
Enabling business leaders to procure labour in the most transparent & ethical way, whilst enhancing colleague data & experience



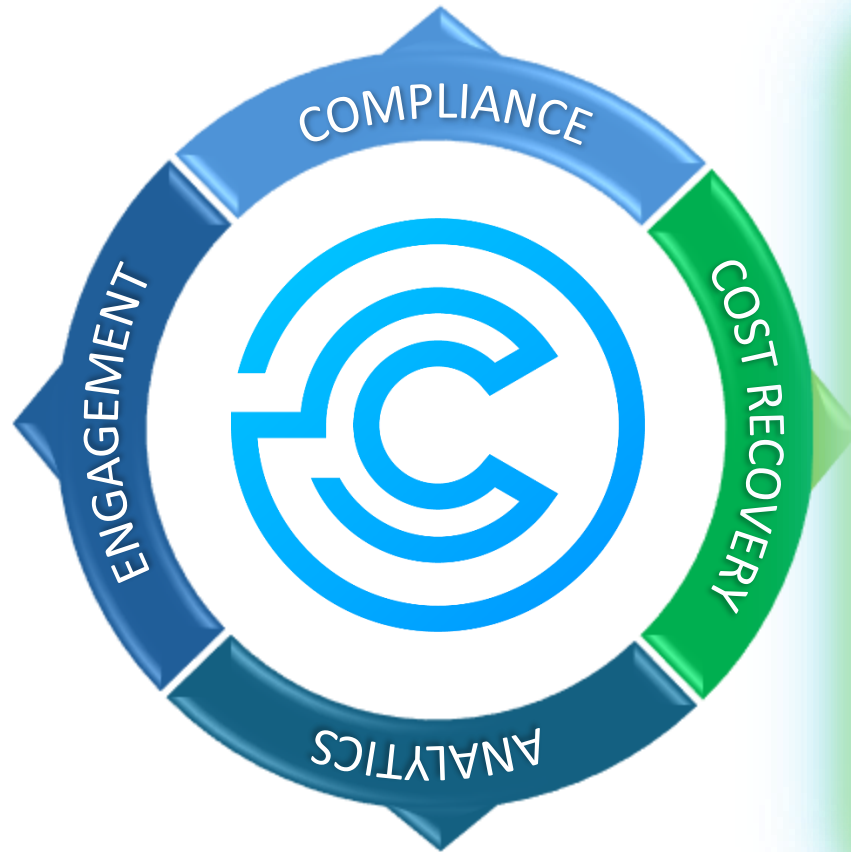


# INDUSTRY FLAWS

- ✓ COST
- ✓ CONTROL
- ✓ COMPLIANCE



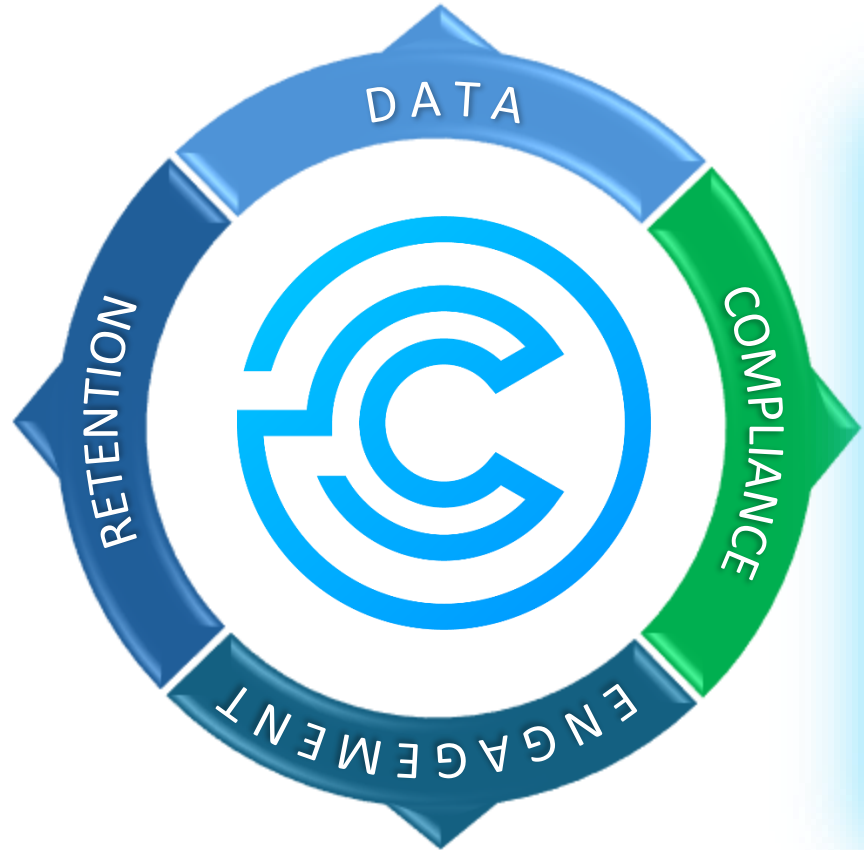
- ✓ **Transparent**
- ✓ **Automated**
- ✓ **Fair**



- ✓ Automated Weekly Payroll Audit
- ✓ Itemised National Insurance Costs
- ✓ Itemised Pension Status
- ✓ Tracking Holiday Payments
- ✓ Cost Recovery (£0.57 p/hr average)
- ✓ Contract Governance
- ✓ Fair & Sustainable Supplier Margins



- ✓ Centralised
- ✓ Automated
- ✓ Safeguarding



**Excessive Hours**

60+ hours worked in one week

**Insufficient Breaks**

Less than 2 days rest in 14

**Multi-Occupancy**

5 or more colleagues in one dwelling

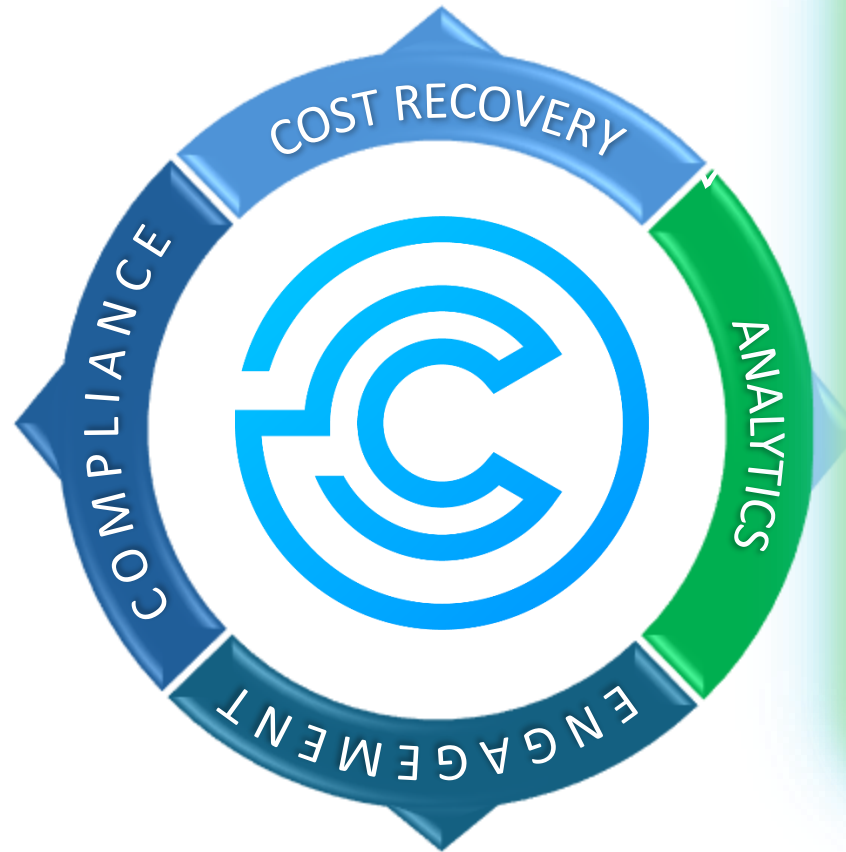
**Bank Account**

2 or more duplicate bank account





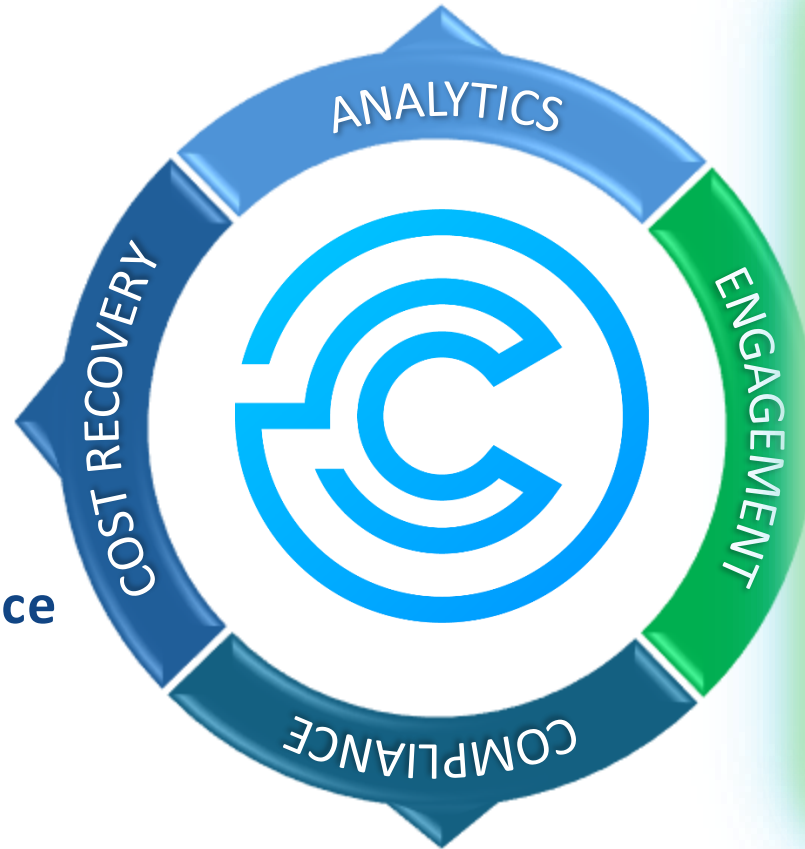
- ✓ Automated
- ✓ Factual
- ✓ Intelligence



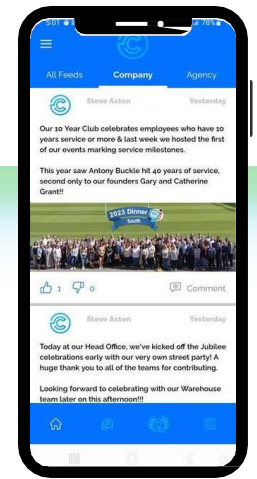
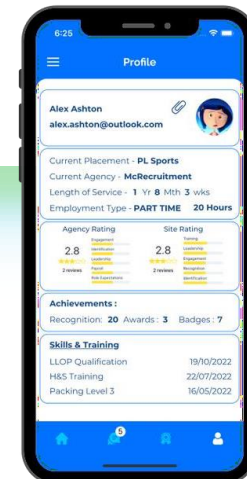
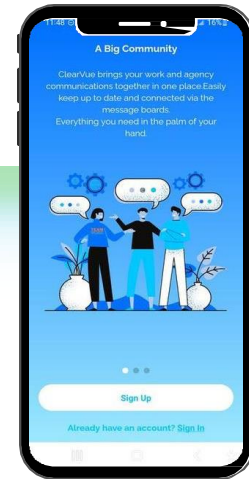
- ✓ Automated Workforce Data
- ✓ Agency Spend & Hours
- ✓ Workforce Demographics
- ✓ Labour Pool Management
- ✓ Balanced Agency Scorecard
- ✓ Leaver Information
- ✓ Agency Scorecard
- ✓ Trend & Forecast Analysis



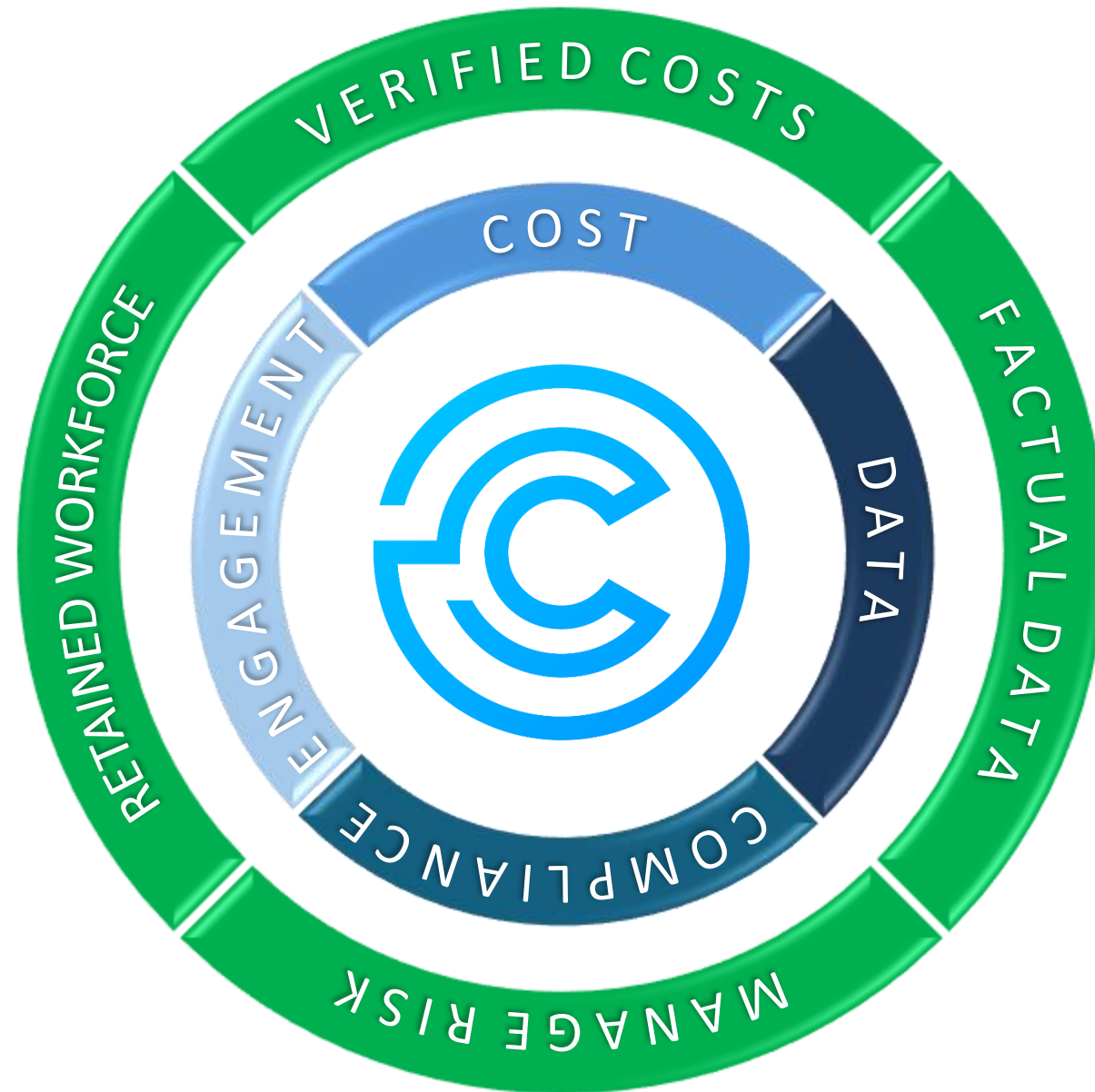
- ✓ Worker voice
- ✓ Inclusive
- ✓ Employer of Choice



- ✓ Enhance New Starter Experience
- ✓ Replicate Perm Colleague Engagement
- ✓ Understand Your Workforce
- ✓ Act Upon Direct Colleague Feedback
- ✓ Extended Support
- ✓ Data Driven Retention Strategies
- ✓ Inclusive Workplace Culture



- ✓ **Transparency**
- ✓ **Automation**
- ✓ **Factual**
- ✓ **Equitable**



# What our customers say

## THG

Whilst The ClearVue has certainly delivered our objective of ensuring contract governance is properly maintained, the additional value they have brought has been excellent.

Both the granularity and accuracy of contract workforce and compliance data has complemented our operational decision making and the guidance given to navigate key labour strategies has been of valuable support..”

**Ian Cross**  
Chief Procurement Officer



The commercial benefits have been a pleasant surprise, making it an easy decision to roll The ClearVue out across the business.

More importantly, the compliance & welfare data has enabled us to take immediate action to address & reduce modern slavery risk which has been recognised in our ethical audits. We are looking forward to starting the app roll out in the coming weeks to enable direct colleague feedback and the implementation of strategies to enhance welfare and satisfaction.

**Steve Ryder**  
Procurement Category Manager



“The ClearVue team were straightforward to work with, and their platform was very easy to implement for our UK sites.

Since implementation of The ClearVue platform we identified immediate benefits in contract labour cost mitigation, in addition to gaining the assurance that our contract terms were being correctly applied”

**Neil Bradford**  
Procurement & Sustainability Director



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# 2 Sisters Food Group Human Rights Due Diligence approach

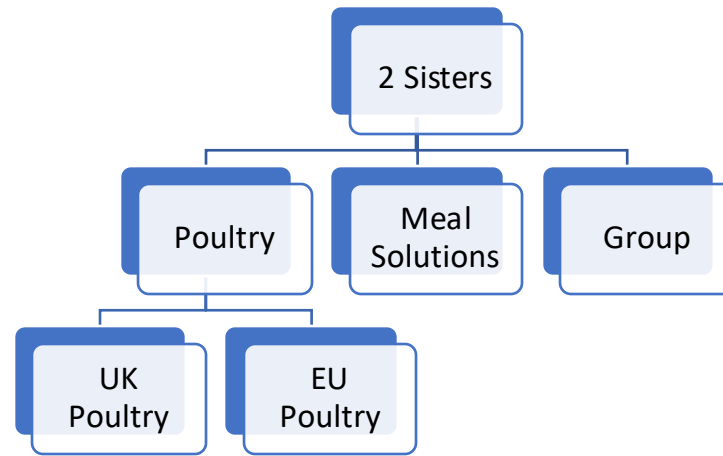
Rachel Hackett

12.10.24

# 2 Sisters Food Group



**c13,500**  
colleagues  
36 different nationalities

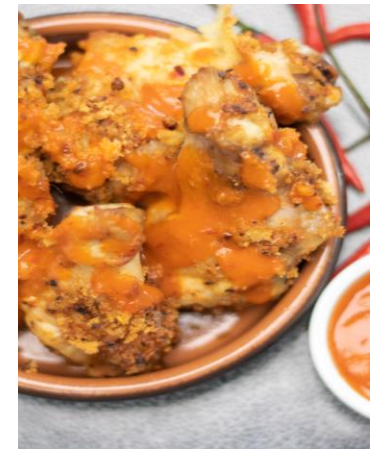


Diverse product range, predominately own label



# Contents

- Commit: Policy & accountability
- Assess: Traceability & risk assessment
- Act: Prevention & mitigation
- Monitor: Performance tracking/monitoring
- Remedy :
- Communicate: Reporting & communication





# Policy and Accountability



		CURRENT	ASPIRATION
POLICY AND ACCOUNTABILITY	Commitment and policies	<ul style="list-style-type: none"> <li>• HR policies</li> <li>- HR &amp; Ethical Trade</li> <li>- Prevention of Hidden Labour Exploitation</li> <li>- Young Worker and Child Labour</li> <li>- Modern Slavery Remediation</li> <li>• Supplier Sustainability COP in place, SEDEX requirements</li> <li>• Modern Slavery Statement</li> <li>• Public reporting through Sustainability report</li> </ul>	<ul style="list-style-type: none"> <li>• Business has positive impact on human rights and environment in operations and supply chain</li> <li>• Climate transition plan that integrates human rights and nature</li> </ul> <p><b>ACTIONS</b></p> <ul style="list-style-type: none"> <li>• <b>Transition plan for Net Zero, including human rights and biodiversity impacts</b></li> <li>• <b>Supplier chain environment &amp; human rights impacts</b> <ul style="list-style-type: none"> <li>➤ <b>Supplier onboarding process</b></li> <li>➤ <b>Supplier Sustainability COP</b></li> </ul> </li> </ul>
	Resource	<ul style="list-style-type: none"> <li>• Defined roles for HR and Env, and budget</li> <li>• Senior Management responsibility for HREDD</li> <li>• HREDD is part of roles but not necessarily explicit</li> </ul>	<ul style="list-style-type: none"> <li>• Responsibility for policy implementation embedded across departments/functions</li> </ul>
	Training	<ul style="list-style-type: none"> <li>• Staff have basic HR and Env awareness.</li> <li>• Relevant staff incl. senior managers and operational leads receive human rights and environment training</li> </ul>	<ul style="list-style-type: none"> <li>• Regular training of relevant decision makers across departments including Board</li> <li>• SMEs across functions?</li> </ul>

# Policy and Accountability - Actions



## Supplier Sustainability Code of Practice


- Adherence to Human Rights & Ethical Trading policy
- SEDEX registration & SAQ completion
- Independent ethical audit if assessed as high risk
- Banned & restricted countries

## Supplier onboarding

- Ensuring understanding of requirements (and beyond initial on-boarding)

## Communication

- Enable more rapid communication to suppliers



**Supplier Sustainability Code of Practice**

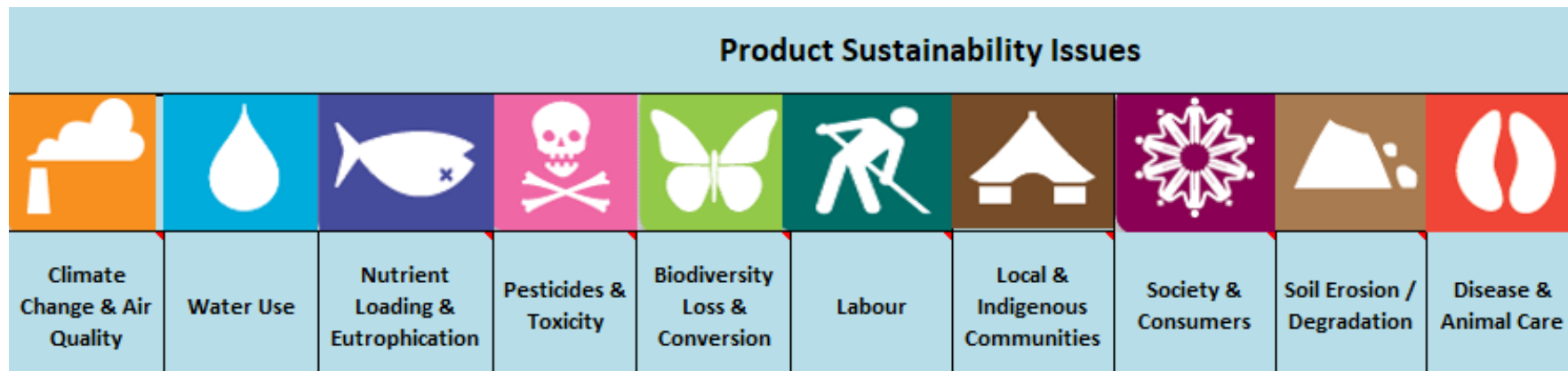
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Ref	Issue No	Enquiries To	Date of Issue	Page No
2SFG ENW003	8.0	Group Sustainability Director	August 2023	Page 2 of 17



	CURRENT	ASPIRATION	ACTIONS
<b>TRACEABILITY AND RISK ASSESSMENT</b>			
Prioritisation	<ul style="list-style-type: none"> <li>Internal raw material risk assessment based on environmental and human rights risks</li> <li>Climate risk assessment for CFD reporting</li> <li>Water risk assessments using WWF Risk Filters</li> </ul>	<ul style="list-style-type: none"> <li>Full transparency of supply chains</li> <li>Understand and map future climate risks and impacts</li> <li>Regular review of human rights and environmental risks</li> </ul>	<ul style="list-style-type: none"> <li>Join up human rights and environmental risk assessment</li> <li>Deepen understanding of high risk supply chains</li> <li>Collaborative actions through industry organisations/partnerships</li> </ul>
Traceability	<ul style="list-style-type: none"> <li>Documented traceability system in place</li> <li>Full supply chain map for certain raw materials</li> </ul>	<ul style="list-style-type: none"> <li>Traceability system reaches back to farm for at-risk raw materials (from both an environmental and Human Rights perspective)</li> </ul>	<ul style="list-style-type: none"> <li>Supplier engagement on challenges and transparency</li> </ul>



- Additives
- Bakery & cereal products
- Cake & confectionery
- Dairy products
- Drinks
- Egg & Egg products
- Fish & shellfish
- Fruit & vegetables
- Herbs & spices
- Materials in contact with food
- Meat & meat products, game & poultry
- Nut & nut products
- Other
- Soups, broths & sauces

## Key environmental risks

- Climate change
- Water availability and water quality
- Biodiversity loss

## Key human rights risks

- Forced labour
- Child labour
- Poor working conditions



# Prevention and mitigation



	CURRENT	ASPIRATION	ACTIONS
<p style="writing-mode: vertical-rl; transform: rotate(180deg);"><b>PREVENTION AND MITIGATION</b></p> <ul style="list-style-type: none"> <li>• Actions in place to mitigate human rights and environmental risks in operations:               <ul style="list-style-type: none"> <li>• Modern Slavery Awareness training</li> <li>• Site modern slavery risk assessments and action plans</li> </ul> </li> <li>• Human Rights and environmental management requirements set out in Supplier Sustainability COP at onboarding</li> <li>• Actions in place to mitigate human rights and environmental risks in supply chains:               <ul style="list-style-type: none"> <li>• SEDEX requirements</li> <li>• Labour provider audits</li> </ul> </li> <li>• Collaboration through collective action - FNET, MSIN</li> </ul>	<ul style="list-style-type: none"> <li>• Human rights and environmental risks and approach embedded in all purchasing decisions and supplier on-boarding</li> </ul>	<ul style="list-style-type: none"> <li>• Deepen understanding of product environmental and human rights impacts</li> </ul>	

	CURRENT	ASPIRATION	Actions
REMEDY	<ul style="list-style-type: none"><li>• Formal grievance mechanisms and whistleblowing hotlines in place in own operations</li><li>• Supply chain</li><li>• Labour providers</li><li>• Modern slavery remediation policy</li><li>• Employee app</li></ul>	<ul style="list-style-type: none"><li>• Effective human rights remediation mechanisms in place within own operations and supply chain</li></ul>	<ul style="list-style-type: none"><li>• Understand effectiveness of current grievance mechanisms</li></ul>

# Tracking performance/monitoring

	CURRENT	ASPIRATION	Actions
<b>TRACKING PERFORMANCE/ MONITORING</b>	<p><u>Operations</u> Monitoring &amp; reporting human rights performance:</p> <ul style="list-style-type: none"><li>• Modern slavery KPIs</li><li>• Ethical audit</li><li>• Training and roll out of EDI strategy</li><li>• Labour provider audits</li></ul> <p><u>Supply chain</u> Monitoring human rights performance</p> <ul style="list-style-type: none"><li>• Supplier compliance with SEDEX requirements</li></ul>	<ul style="list-style-type: none"><li>• Improvement across supply chain and risk reduction</li><li>• Single report collating human rights and environment data.</li></ul>	<ul style="list-style-type: none"><li>• Internal communication and information sharing e.g Quarterly report to Procurement</li></ul>



## Communication and engagement

- Board sub-committee
- Technical Leadership Team
- Supply Chain Ethical/Integrity Forum
- Food Integrity Forum
- Specific supplier issues – Technical/Sustainability/Procurement
- Quarterly Sedex review – Group Procurement

## Cross functional groups

### Supply Chain Ethical/Integrity Forum

Chair: Group Sustainability Director

Sustainability, Group Technical Services, SMEs, Group Integrity lead

Sustainability COP compliance

Labour providers/other service providers

Current raw material issues; human rights or integrity issue monitoring

### Food Integrity Forum

Chair: Group Integrity Lead

Divisional Technical teams, Group Technical, SMEs, Procurement, Sustainability

Horizon scanning

Surveillance updates

2 Sisters Food Group:  
**SEDEX October 2024 Review**  
|Summary



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# The Perception Verses Reality: Supply Chain Due Diligence

Jenni Edwards ESC International

# Pilots

- Food production businesses
- Labour agencies
- Service providers
- Waste businesses
- Hospitality business



# Perception V Reality

- **Perception:**

"Many companies within supply chains believe they have strong supply chain controls in place based on Codes of Conduct and supplier self-reported compliance. These assessments often report 90%+ compliance, giving the impression that risks are well-managed."

- **Reality:**

"Our pilots revealed that the actual risk control performance is far lower—typically between 15-25%. These discrepancies highlight the limitations of current due diligence methods, leaving businesses exposed to significant risks."

# Key Challenges

- **Challenge 1:**

- "Lack of visibility into actual supplier practices beyond reported compliance or a snapshot audit."

- **Challenge 2:**

- "Inconsistent risk management standards across different regions and sectors."

- **Challenge 3:**

- "Difficulty in monitoring and enforcing continuous compliance without a robust system."

# Challenges of SCDD

Companies often rely on self-assessments and Codes of Conduct (CoCs) or snapshot risk assessments to manage supply chain risks. However, these methods fail to capture the full scope of human rights risks, leaving businesses vulnerable to gaps in their risk control.





<p><b>2. Management Representative</b> Identify a management representative who has clearly defined responsibility and authority for delivering human rights and ethical employment practices within your organisation.</p>	<ul style="list-style-type: none"> <li>*A named 'Human Rights and Ethical Employment Champion' has been identified by top management</li> <li>*This person has a clearly defined responsibility and authority for:             <ul style="list-style-type: none"> <li>- The establishment, implementation and maintenance of an effective human rights and ethical employment practices management programme</li> <li>- Reporting on ethical/ethical employment practice</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>*The organisation meets all the requirements as stated for Level 1</li> <li>*It can be demonstrated that sufficient resources (i.e. funding, training) have been made available for the establishment, implementation and maintenance of an effective human rights ethical employment practices management programme</li> </ul>	<ul style="list-style-type: none"> <li>*The organisation meets all requirements as stated in Levels 1 &amp; 2</li> <li>*It can be demonstrated that there is continued commitment to having a named management representative (with sufficient resources and authority to maintain and enhance an effective ethical employment standards management programme)</li> </ul>	<ul style="list-style-type: none"> <li>*The organisation meets all the requirements as stated in Levels 1, 2 &amp; 3</li> <li>*The management representative responsible for human rights and ethical employment standards is a member of the highest management level within the organisation (e.g. Board of Directors)</li> </ul>
<p><b>3. Risk Assessment</b> The organisation shall operate a procedure(s) to: - Identify human rights and ethical employment practices relate to the organisation - Risk assess the extent to which human rights and ethical employment practice abuses do, or could, occur within: i) The organisation's direct operations ii) Its supply chains for goods, services and labour - Consider the views of key interested parties - Review and risk assess expenditure</p>	<ul style="list-style-type: none"> <li>*The organisation has undertaken and documented a high level human rights and ethical employment practices risk assessment</li> <li>*Issues and risks of modern slavery and/or illegal unethical employment practices in products and services within the UK and overseas have been identified.</li> </ul>	<ul style="list-style-type: none"> <li>*The organisation meets all the requirements as stated in Level 1.</li> <li>*A clear procedure is followed to ensure a consistent approach to undertaking a human rights and ethical employment practices risk assessment at appropriate intervals</li> <li>*Regular reviews of expenditure and a risk assessment undertaken of the findings.</li> <li>*The employment practices of high risk suppliers and labour providers are monitored:</li> <li>- Ethical employment forms a standard agenda item for all contract meetings/reviews for suppliers and labour providers identified as relevant via the risk assessment</li> </ul>	<ul style="list-style-type: none"> <li>*The organisation meets all the requirements as stated in Level 1 &amp; 2.</li> <li>*It can be demonstrated that an effective process is in place for gaining the views of relevant stakeholders and key interested parties</li> <li>*Any suppliers and labour providers identified as high risk are investigated through direct engagement with workers where possible</li> <li>*Demonstrate that broader research and review into human rights and ethical employment standard risks and common issues are occurring, in addition to how these may be relevant to the organisation's activities</li> </ul>	<ul style="list-style-type: none"> <li>*The organisation meets all the requirements as stated in Levels 1, 2 &amp; 3</li> <li>*Full traceability exists to cover principle stages of any manufacture and/or high risk stages of the supply chain and labour supply chain, including the sub-contracting of any part of the activities</li> <li>*Any issues of illegal and unethical practice is rectified through direct engagement with the supplier</li> </ul>
<p><b>4. Legal and Other Requirements</b> <b>The organisation shall operate a procedure(s):</b> - <b>To identify information on relevant employment and human rights legislation, customer commitments (e.g., Company's Code of Practice), and other requirements as they apply to its direct operations, contractors, sub contractors, suppliers and parties in the supply chain</b> - <b>Ensure staff with responsibility for human rights and ethical employment practices have access to this information</b> - <b>Pay at least the minimum wage and be</b></p>	<ul style="list-style-type: none"> <li>*A procedure(s) has been implemented to identify information on relevant employment and human rights legislation, customer commitments, and other requirements with regard to its direct operations</li> <li>*Ensure staff with responsibility for human rights and ethical employment practices have access to this information and understand how it applies in relation to their roles and responsibilities</li> <li>*Ensure workers are free to join a Trade Union or Collective agreement</li> <li>*Ensure that all staff working in the UK and overseas are paid at least the minimum wage</li> </ul>	<ul style="list-style-type: none"> <li>*The organisation meets all the requirements as stated in Level 1, but has extended this to cover the relevant activities of its contractors, sub contractors and suppliers</li> <li>*There is a system in place to identify proposed legislative changes as they apply to the organisation's direct operations</li> <li>*Staff with responsibility for human rights ethical employment practices in the organisation's direct operations, contractors, sub contractors and/or suppliers have access to this information and understand how it applies in relation to their roles and responsibilities</li> <li>*It can be demonstrated that suppliers allow Trade Union representatives to access members and contracted workers.</li> </ul>	<ul style="list-style-type: none"> <li>*The organisation meets all requirements as stated in Levels 1 &amp; 2.</li> <li>*This has been extended this to cover the relevant activities of parties within the supply chain, as identified within human rights and ethical employment standards status reviews at this level</li> <li>*It can be demonstrated that the organisation pays a fair wage to all staff and workers</li> <li>*It can be demonstrated that suppliers pay a fair wage to all staff and workers</li> </ul>	<ul style="list-style-type: none"> <li>*The organisation meets all the requirements as stated in Levels 1, 2 &amp; 3</li> <li>*Systems are in place to identify proposed changes to relevant legislation and other requirements as they apply to contractors, sub contractors, suppliers and parties in the supply chain</li> </ul>

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# Option 1: Direct Delivery for Your Business

- **What We Offer:** Full management system review of your supply chain to assess risks for human rights and labour standards.
- **Value:** Provides insight into supply chain risk management, helping businesses take control and upskill suppliers.
- **Ideal For:** Businesses aiming to manage their supply chains independently and proactively.

# Option 2: Pilot Programme with BSI

- **What We Offer:** Pilot programme using the BSI platform to share supplier data across multiple businesses.
- **Value:** Provides collective data sharing, training, and cost-effective solutions through shared suppliers.
- **Ideal For:** Companies looking for collaborative supplier improvement.

# Option 3: Integrated FNET Solution

- **What We Offer:** FNET tools included in the BSI for measurable supplier risk assessments and management system assessments.
- **Value:** Fully scalable and measurable solution for continuous improvement across supply chains.  
Real data for FNET members
- **Ideal For:** Organisations needing a holistic, measurable solution that integrates with existing FNET approach .



The future of supply chain due diligence lies in shifting from reactive assessments to proactive, ongoing management. Let's close the gap between perception and reality and build a supply chains that upholds human rights and ethical standards."



# Thoughts captured from the morning sessions

WHAT HAVE YOU LEARNED?

WHAT CAN YOU USE IN OWN OPERATIONS?

HAVE YOU ANY FURTHER INSIGHTS

**Time to relax,  
catch up on  
mail, network  
& enjoy some  
fabulous  
Samworth  
Group  
hospitality**



# Agenda

Estimated time	Item
10.00 – 10.20	<ol style="list-style-type: none"> <li>Welcome and introduction</li> <li>Setting the scene</li> <li>What do you understand by enhanced due diligence and what is an example of EDD</li> <li>What do we mean by Enhanced Due Diligence Systems?</li> </ol>
10.20 – 11.00	Case Study 1 – <b>Ongoing Monitoring and Reporting. Clearvue, Geoff Taylor, Commerical Dir. &amp; Nick Jones, CEO</b> – How the Clearvue platform supports cost effective enhanced due diligence in managing temporary and agency labour? Co-presentation with <b>Mitchell Kempster, Warehouse Resource and Agency Manager, Frasers Group</b>
11.00 – 11.30	Case Study 2 – <b>In-Depth Assessment of Ethical Risk. 2 Sisters Food Group, Rachel Hackett, Group Sustainability Dir.</b> Using the UNGP framework to review status of each element and develop action plans for enhanced due diligence
12.00 – 12.30	Case Study 3 – <b>Verification of Ethical Standards. ESC International, Jenni Edwards</b> – Risk Management approach to enhanced due diligence through management systems review. Use of BSI platform for M&E reporting
12.30 – 13.30	Lunch
13.30 – 13.45	Case Study 4 – <b>Stakeholder Engagement. Westfalia Fruit, Mel Miles</b> - Forced Labour and Prison Labour Project in Brazil
13.45 -14.15	Activity Case study 4 – SLIDO – Should we use this supply Chain? Critique the case study on groups - What else could have been done?
14.15 - 14.30	Present back summarise Outcome – Recommendation should we use this supply chain? SLIDO
14.30 - 15.00	How do we use the information from today? Discussion Output – One pager infographic from conversations with suppliers (simple) to HRIA (complex)
15.00-15.30	AOB – Summarise Next Steps What Next – SMETA 7 - Collaborative Action Required. How can the WG support? 2025/26 - Future planning for next years workshop

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# Discussion – What Next for Enhanced Due Diligence for FNET

What are the expected outputs for the day? -

How do we turn knowledge into action?

How do we measure impact? What are our WG KPI's?





# **Working Group Planning for 2025/26**

# Common Due Diligence Tools Plan – Project Status

Project	Status	Date Completed	Output	Comments
FNET Resolution of Ethical audit issues guidance	Completed and Updated		Guidance Document	
HRDD Framework (Word)	Completed and issued – used by FNET team for all new member assessment	Jan 2024	HRDD V1 on website	Requested further developments
Develop Guidance on Low Leverage	Completed – waiting for Responsible Exit & Design	May 2024	Guidance Document	
FNET Risk Assessment Tool Updated for 2024	Anthesis Work Completed	October 2024	FNET Risk Assessment Tool	On budget
	Front End Sign for Macros – brief to be raised	Estimate November 2024	Updated RAT 2024	
	Training Video	Estimate December 2024	Training Video for members	Rick Fletcher
HRDD Framework separate to own operations and supply chains and Excel	Pending	Estimate December 2024	An Excel version for on ops and supply chains	Naomi Kirkwood to complete
Cost Effective Enhanced DD & options for mitigation	Q3 Workshop in place – Training and knowledge sharing	October 2024	To be confirmed	
Guidance on Human Rights Risk Assessments	Not started		Guidance/Training/ Knowledge sharing	
Develop a roadmap for Responsible Business Journey	Not started			

# Discussion – What Next for Common Due Diligence Working Group Plan for 2025/26

What do we want to consider for 2025/26 workplan?

Consider what emerging issues, future requirements, impact of SMETA 7, what else?

Note: we are running a table session in the All-Member day to help frame some activities for the next year in the work plan.

- How are you progressing with Human rights DD
- What is holding you up?
- What can FNET do to help?